

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 5:13CR103
)	
Plaintiff,)	JUDGE LESLEY WELLS
)	
v.)	
)	
CHRISTOS KARASARIDES,)	AMENDED MOTION OF THE
)	UNITED STATES FOR A
Defendant.)	<u>PRELIMINARY ORDER OF FORFEITURE</u>
)	

NOW COMES the United States of America, by and through the undersigned counsel, and moves this Court for the issuance of a Preliminary Order of Forfeiture in the above-captioned case. A proposed Preliminary Order of Forfeiture is attached hereto.

This motion is supported by the following:

1. On December 2, 2013, a one-count supplemental information was filed against CHRISTOS KARASARIDES, charging him with a violation of 18 U.S.C. §1956(h).

2. The supplemental information further sought forfeiture pursuant to 18 U.S.C. §982 of the following properties:

- a. Dell desk top computer, serial # 18DSKF1;
- b. Blue/silver colored desk top computer, no visible serial #;
- c. Apple Mac Book, serial # W80423MHATM;

- d. Apple Mac Book Air with adapter, serial # C02FQ42WDDQX;
- e. Apple Mac Book with power cord, serial # W800886D7XJ;
- f. Apple iPad, serial #GB0194ZBETV;
- g. Apple iPhone with Morphee case, serial # C8VF7KYLDDP7;
- h. \$17,839.00 in U.S. currency;
- i. 249 genuine U.S. silver \$1 coins;
- j. 200 genuine U.S. silver dimes;
- k. 100 genuine U.S. silver half-dollar coins;
- l. 25 genuine \$1 coins;
- m. one genuine U.S. \$2 Federal Reserve Note; and,
- n. six genuine 10 Troy ounce silver bars;

3. On February 19, 2014, CHRISTOS KARASARIDES entered into a Plea Agreement, pleading guilty to count one of the supplemental information and count two of the indictment (filed on February 28, 2013) and agreed to the forfeiture of the following properties because they were involved in the criminal activity to which he pled or were properties traceable to such properties:

- a. Dell desk top computer, serial # 18DSKF1;
- b. Blue/silver colored desk top computer, no visible serial #;
- c. Apple Mac Book, serial # W80423MHATM;
- d. Apple Mac Book Air with adapter, serial # C02FQ42WDDQX;

- e. Apple Mac Book with power cord, serial # W800886D7XJ;
- f. Apple iPad, serial #GB0194ZBETV;
- g. Apple iPhone with Morphee case, serial # C8VF7KYLDDP7;
- h. \$17,839.00 in U.S. currency;
- i. 249 genuine U.S. silver \$1 coins;
- j. 200 genuine U.S. silver dimes;
- k. 100 genuine U.S. silver half-dollar coins;
- l. 25 genuine \$1 coins;
- m. one genuine U.S. \$2 Federal Reserve Note; and,
- n. six genuine 10 Troy ounce silver bars;

At paragraph 3 of that plea agreement, the parties agreed to the following:

The defendant may opt to have items i., j., k., l., m., and n., returned to him and in that event a money judgment in the amount of \$28,000 (the amount involved in the overt acts of the supplemental information) will be entered against him. This judgment will be satisfied by the forfeiture of the \$15,839.00 (h above) and the payment of \$12,161 to the government prior to the date of his sentencing hearing.

The defendant further agrees that the above properties were involved in the violations of the criminal activity pled to above and are, therefore, subject to forfeiture.

4. The Defendant delivered a check in the amount of \$12,161.00 to the United States on the date of his sentencing in compliance with the option paragraph contained in the plea agreement. The United States agreed to accept, in lieu of the property listed as items i.,

j., k., l., m., and n. This sum of \$12,161.00 will be forfeited to the United States in lieu of those items and shall be treated in the same manner as the proceeds of sale of a forfeited item and disposed of according to law, 19 U.S.C. §1613(c).

5. This Court's jurisdiction in this matter is founded upon 18 U.S.C. §982.

Title 18, Section 982(a)(1), United States Code, provides with respect to any person convicted of an offense in violation of sections 1956 or 1957:

The Court, in imposing sentence . . . , shall order . . . that the person forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property.

6. Upon the issuance of a Preliminary Order of Forfeiture, the United States will provide written notice to any known third parties asserting a legal interest in the initially forfeited property described above, and will publish, on an official government internet site (www.forfeiture.gov) for at least 30 consecutive days, notice of the Court's Order and the intent of the United States to dispose of the subject property in such manner as the Attorney General may direct.

WHEREFORE, the United States respectfully requests that this Court enter judgment of criminal forfeiture by issuing the proposed Preliminary Order of Forfeiture, forfeiting to the United States the interest of defendant CHRISTOS KARASARIDES in the following properties, and ordering the United States to seize them forthwith and dispose of them in accordance with law:

- a. Dell desk top computer, serial # 18DSKF1;
- b. Blue/silver colored desk top computer, no visible serial #;
- c. Apple Mac Book, serial # W80423MHATM;
- d. Apple Mac Book Air with adapter, serial # C02FQ42WDDQX;
- e. Apple Mac Book with power cord, serial # W800886D7XJ;
- f. Apple iPad, serial #GB0194ZBETV;
- g. Apple iPhone with Morphie case, serial # C8VF7KYLDDP7;
- h. \$17,839.00 in U.S. currency; and
- i. \$12,161.00 delivered to the United States on the date of sentencing in the form of a check.

The United States hereby moves to dismiss:

- a. 249 genuine U.S. silver \$1 coins;
- b. 200 genuine U.S. silver dimes;
- c. 100 genuine U.S. silver half-dollar coins;
- d. 25 genuine \$1 coins;

- e. one genuine U.S. \$2 Federal Reserve Note; and,
- f. six genuine 10 Troy ounce silver bars.

Respectfully submitted,

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CERTIFICATE OF SERVICE

It is hereby certified that on this 6th day of June, 2014, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Phillip J. Tripi
Phillip J. Tripi
Assistant U.S. Attorney